

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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JOAQUIN FRANQUI III, Administrator of the Estate  
of JACK FRANQUI IV,

Plaintiff,

-against-

THE COUNTY OF SUFFOLK, SUFFOLK COUNTY  
POLICE DEPARTMENT, POLICE OFFICER  
KAREN GREINIA, POLICE OFFICERS JOHN AND  
JANE DOES 1-10,

Defendants.

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**DEFENDANTS COUNTY  
OF SUFFOLK, SCPD AND  
GREINIA'S INITIAL  
DISCLOSURES  
PURSUANT TO RULE  
26(a)(1)(A)  
CV13-5943**

Pursuant to Fed. R. Civ. P. Rule 26(a)(1)(A), the County of Suffolk, Suffolk County  
Police Department and Police Officer Karen Greinia make the following initial disclosures:

(i) the name and, if known, the address and telephone number of each individual likely  
to have discoverable information that the disclosing party may use to support its claims or  
defenses, unless the use would be solely for impeachment.

- 1) Karen Greinia
- 2) Dennis Kozik
- 3) Odette Hall, M.D.
- 4) John Best
- 5) John Fitzpatrick
- 6) Michael Romanoli
- 7) Kevin Corrigan
- 8) William Kerensky
- 9) Janine Lesiewicz
- 10) Douglas Libonati
- 11) Robert Strehle
- 12) Jamie Rios

The address of the above listed persons is c/o Suffolk County Attorney's Office, H. Lee Dennison Building, 100 Veterans Memorial Highway, Hauppauge, New York 11788

ii) a copy or a description by category and location of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment.

- 1) Arrest paperwork under cc# 13-00422405.
- 2) Internal Affairs Bureau Report.
- 3) Autopsy Report.

iii) a computation of each category of damages claimed by the disclosing party.

Not applicable.

iv) any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.

The County of Suffolk is self-insured up to \$3,000,000.00 and has excess insurance coverage in the aggregate sum of \$55,000,000.00.

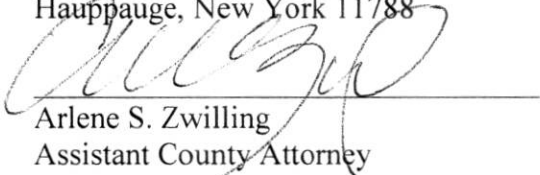
PLEASE TAKE NOTICE that foregoing disclosure is not intended to be exhaustive of all information arguably required to be disclosed pursuant to Rule 26(a)(1)(A), but is intended merely to present the information presently known to defendants, which Rule 26(a)(1)(A) reasonably may be seen as requiring the disclosure of. Defendants reserve their right to supplement and/or amend this automatic disclosure response upon completion of further

investigation of this claim; production of required automatic disclosure by plaintiffs; or as additional information becomes available to them.

Dated: Hauppauge, New York  
March 19, 2014

Yours etc.,  
Dennis M. Brown  
Suffolk County Attorney  
Attorney for Defendants  
The County of Suffolk, Suffolk County  
Police Department and P.O. Grenia  
H. Lee Dennison Building  
100 Veterans Memorial Highway  
Hauppauge, New York 11788

By:

  
Arlene S. Zwillling  
Assistant County Attorney

TO: ANTHONY M. GRANDINETTE, ESQ.  
Attorney for Plaintiff  
114 Old Country Road  
Mineola, New York 11501  
(516) 877-2889



Docket No. CV13-5943

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JANE DOES 1-10,

Defendants.

**DEFENDANTS COUNTY OF SUFFOLK, SCPD AND GREINIAS'  
INITIAL DISCLOSURES PURSUANT  
TO RULE 26(a)(1)(A)**

DENNIS M. BROWN  
Suffolk County Attorney  
By: Arlene S. Zwilling  
Assistant County Attorney  
Attorney for Defendants  
The County of Suffolk,  
Suffolk County Police Department  
and P.O. Karen Greinia  
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P.O. Box 6100  
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(631) 853-4049